

Message Text

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ACTION OES-07

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UNCLAS SECTION 01 OF 02 TOKYO 10251

FOR OES/ENP/EN

DEPT PASS TO OSHA

E.O. 11652: N/A

TAGS: SENV, ECEM, JA

SUBJECT: EMERGENCY TEMPORARY STANDARD-ACRYLONITRILE (AN)

FOR OCCUPATIONAL EXPOSURE

REF: (A) STATE A-1047, (B) TOKYO 4620

1. IN LATE MAY, INDUSTRIAL HEALTH DIVISION OF MINISTRY
OF LABOR PROVIDED EMBASSY WITH ANSWERS TO QUESTIONS
CONCERNING OCCUPATIONAL EXPOSURE TO ACRYLONITRILE (AN)
CONTAINED IN REFAIR. FOLLOWING ARE ANSWERS TRANSLATED
FROM JAPANESE INTO ENGLISH:

I. BACKGROUND

Q-1. DOES YOUR COUNTRY PRODUCE AN?

A-1. YES, IT DOES.

Q-2. DOES YOUR COUNTRY IMPORT AN FOR USE IN ACRYLIC
FIBERS AND/OR PLASTICS?

A-2. NO, IT DOES NOT.

Q-3. HOW MANY PRODUCTION FACILITIES FOR AN-BASED PRODUCTS?

OUTPUT OF THESE FACILITIES? AMOUNT EXPORTED TO U.S.?

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CAPACITY OF THESE FACILITIES?

A-3. 8 PLANTS MANUFACTURING ACRYLIC FIBERS: OUTPUT FOR
1973 335,300 TONS; CAPACITY IN 1975 926 TONS PER DAY.

6 PLANTS MANUFACTURING "AS" RESIN: OUTPUT FOR 1973
56,900 TONS; CAPACITY IN 1975 106,000 TONS PER YEAR.

11 PLANTS MANUFACTURING ABS RESIN: OUTPUT FOR 1973
226,000 TONS; CAPACITY IN 1975 275,000 TONS PER YEAR.

2 PLANTS MANUFACTURING NBR (SYNTHETIC RUBBER): OUTPUT FOR 1973 31,400 TONS; CAPACITY IN 1975 50,000 TONS PER YEAR. ACRYLIC FIBERS EXPORTED TO THE U.S. AMOUNTED TO 4,842 TONS IN 1976. IN ADDITION, THERE ARE ABOUT 93 PLANTS MANUFACTURING PRODUCTS OTHER THAN THOSE MENTIONED ABOVE.

Q-4. LENGTH OF SERVICE OF EACH INDIVIDUAL PLANT.

A-4. NO SPECIFIC INFORMATION AVAILABLE. IN JAPAN, HOWEVER, INDUSTRIAL PRODUCTION OF AN WAS STARTED IN 1959, THAT OF ACRYLIC FIBERS IN 1956 AND THAT OF NBR IN 1959.

Q-5. NUMBER OF WORKERS EXPOSED, THEIR GENDER, AND LENGTH OF TIME IN SERVICE.

A-5. APPROXIMATELY 5,900 WORKERS.

Q-6. IS THERE AN EXISTING EXPOSURE LIMIT TO AN REQUIRED BY LAW IN YOUR COUNTRY?

A-6. THERE IS.

Q-7. LANGUAGE OF ALL LAWS OR REGULATIONS PERTAINING TO AN, AND A BRIEF ETIOLOGICAL HISTORY OF THIS LEGISLATION.

A-7. JAPANESE LANGUAGE. IN 1971, ORDINANCE ON PREVENTION OF HAZARDS BY SPECIFIED CHEMICAL SUBSTANCES WAS FORMULATED IN ORDER TO PREVENT HEALTH DAMAGE BY CHEMICALS AND AN WAS INCLUDED AMONG THE SUBSTANCES SUBJECT TO REGULATION. SUBSTANCES COVERED BY THE ORDINANCE WERE SELECTED ON THE BASIS OF THE FOLLOWING THREE CRITERIA: (A) TOXICITY IS POTENT ENOUGH TO GIVE RISE TO OCCURRENCE OF SERIOUS DAMAGE; (B) POSSIBILITY OF DAMAGE OCCURRING UNCLASSIFIED

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IN MANY CASES, AND (C) DEMONSTRATION OF CASES WHERE DAMAGE ACTUALLY OCCURRED. IN THE CASE OF AN, CASES INVOLVING POISONING OCCURRED. THE ORDINANCE WAS BASED ON THE LABOR STANDARD LAW AT THE TIME OF ITS FORMULATION BUT IT IS NOW UNDER THE OCCUPATIONAL SAFETY AND SANITATION LAW ENACTED IN 1972.

II. MEDICAL STUDIES

Q-1. IS YOUR COUNTRY AWARE OF THE CARCINOGENIC PROPERTIES OF AN?

A-1. WE ARE AWARE OF WHAT WAS REPORTED IN THE U.S. LAST YEAR.

Q-2. IN YOUR COUNTRY HAVE THERE BEEN ANY EPIDEMIOLOGICAL STUDIES CONDUCTED CONCERNING AN?

A-2. NO EPIDEMIOLOGICAL STUDIES ON AN HAVE BEEN CONDUCTED IN JAPAN.

Q-3. ARE YOU AWARE OF POSSIBLE CARCINOGENIC IMPLICATIONS FROM EXPOSURE OF ANIMALS TO AN?

A-3. WE ARE AWARE OF WHAT WAS REPORTED IN THE U.S. LAST YEAR.

Q-4. ARE YOU AWARE OF ANY ANIMAL OR HUMAN STUDIES

CONCERNING AN?

A-4. YES, WE ARE.

III. MEDICAL SURVEILLANCE

Q-1. ARE MEDICAL EXAMINATIONS REGULARLY CONDUCTED ON THE

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ACTION OES-07

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EXPOSED POPULATION?

A-1. YES, THEY ARE.

Q-1-1. WHAT IS THE MEDICAL PROTOCOL?

A-1-1. MEDICAL PROTOCOL IS AS FOLLOWS:

1. INITIAL MEDICAL EXAMINATIONS.

(1) SURVEY OF EMPLOYEE'S WORKING HISTORY.

(2) SURVEY OF PAST OBJECTIVE OR SUBJECTIVE SYMPTOMS

DUE TO EXPOSURE TO AN.

(3) SURVEY OF PRESENT OBJECTIVE OR SUBJECTIVE SYMPTOMS.

2. FOLLOW-UP MEDICAL EXAMINATIONS (TO BE CONDUCTED FOR
THOSE WHO, AS RESULT OF INITIAL MEDICAL EXAMINATIONS,
SHOW OBJECTIVE SYMPTOMS, COMPLAIN OF SUBJECTIVE SYMPTOMS,
OR ELSE ARE SUSPECTED OF ABNORMAL SYMPTOMS, WHOM
PHYSICIANS CONSIDER TO REQUIRE FOLLOW-UP EXAMINATIONS).

(1) SURVEY OF WORKING CONDITIONS.

(2) MEASUREMENT OF SERUM CHOLINESTERASE ACTIVITY VALUE.

(3) EXAMINATION OF LIVER FUNCTION.

Q-1-2. IS THE PROTOCOL DIRECTED AT SYMPTOMS OF EXPOSURE
TO AN?

A-1-2. YES, IT IS.

Q-2. ARE THESE EXAMINATIONS REQUIRED BY LAW?

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A-2. YES, THEY ARE.

Q-3. ARE THESE EXAMINATIONS VOLUNTARY FOR THE EMPLOYEE?

A-3. EMPLOYEES ARE OBLIGATED BY LAW TO UNDERGO EXAMINATIONS.

Q-4. DO THESE INCLUDE PREREPLACEMENT EXAMINATIONS?

A-4. YES, THEY DO.

Q-5. HAVE YOU NOTED ANY ACUTE EFFECTS OF EXPOSURE TO AN?

A-5. YES, WE HAVE.

Q-6. HAVE YOU DISCOVERED ANY CHRONIC TOXIC EFFECTS THAT CAN BE LINKED TO OCCUPATIONAL EXPOSURE TO AN?

A-6. NO, WE HAVE NOT.

Q-7. DO YOU HAVE ANY DOSE RESPONSE DATA ON OCCUPATIONAL EXPOSURE TO AN?

A-7. NO, WE DO NOT.

IV. MONITORING DATA

Q-1. IS MONITORING THE WORKPLACE ATMOSPHERE FOR AN REQUIRED BY LAW?

A-1. YES, IT IS.

Q-2. WHAT METHODS OF MONITORING HAVE BEEN EMPLOYED?

A-2. ANY OF THE FOLLOWING THREE METHODS HAS BEEN EMPLOYED:

(1) SAMPLING BY LIQUID COLLECTION METHOD AND ANALYSIS BY ABSORPTION PHOTOMETRY.

(2) SAMPLING BY SOLID COLLECTION METHOD OR DIRECT COLLECTION METHOD AND ANALYSIS BY GAS CHROMATOGRAPHY.

(3) DETECTOR TUBE (ONLY IN CASE THERE IS NO DANGER OF OTHER SUBSTANCES AFFECTING THE MEASUREMENT).

Q-3. PLEASE CHARACTERIZE OR DISCUSS YOUR EXPERIENCE WITH MONITORING FOR AN.

A-3. MONITORING IS FOR ALL SUBSTANCES COVERED BY THE ORDINANCE ON PREVENTION OF HAZARDS BY SPECIFIED CHEMICAL SUBSTANCES, WITH NO SPECIAL EMPHASIS PLACED ON AN.

Q-4. WHAT IS THE RANGE OF THE LEVELS OF EMPLOYEE UNCLASSIFIED

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EXPOSURE IN YOUR COUNTRY? THE MEAN EXPOSURE LEVEL?

A-4. THE CONCENTRATION OF AN IN THE AIR IN THE WORKING ENVIRONMENT IS REQUIRED TO BE LESS THAN 20 PPM.

MEASUREMENT OF INDIVIDUAL EMPLOYEE EXPOSURE IS NOT OBLIGATORY.

Q-5. DO YOU HAVE ANY PLANTS PRODUCING OR FORMULATING AN THAT, THROUGH ENGINEERING CONTROLS ALONE AND WITHOUT THE USE OF RESPIRATORS, HAVE ACHIEVED EXPOSURE LEVELS OF 2 PPM?

A-5. WE DO NOT HAVE ANY INFORMATION YET AS TO WHETHER

SUCH PLANTS EXIST OR NOT.

Q-6. WHAT ARE THESE ENGINEERING CONTROLS?

A-6. (NO ANSWER)

Q-7. IF YOU HAVE CLOSED SYSTEMS IS THERE ANY PARTICULAR
PROBLEM WITH MAINTENANCE?

A-7. WE HAVE NO INFORMATION.

Q-8. DO YOUR PLANTS HAVE RESPIRATOR PROGRAMS?

A-8. WE HAVE NO INFORMATION. MANSFIELD

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